

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI – SOUTHERN DIVISION**

NORTHROP GRUMMAN SHIP  
SYSTEMS, INC., f/k/a INGALLS  
SHIPBUILDING, INC.,

Plaintiff,

SIDNEY A. BACKSTROM, et al.

Intervenor Plaintiffs

v.

THE MINISTRY OF DEFENSE OF THE  
BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Defendant.

Civil Case No. 1:02-cv-00785-HSO-RHW

**PLAINTIFF’S MOTION FOR  
RECOGNITION AND EXECUTION OF AN ARBITRATION AWARD**

Northrop Grumman Ship Systems, Inc., f/k/a Ingalls Shipbuilding, Inc., and now known as Huntington Ingalls Incorporated (“Plaintiff” or “Huntington Ingalls”), by and through the undersigned counsel, respectfully moves for an order recognizing and executing an international arbitration award, rendered by an arbitral tribunal (the “Tribunal”) seated in Brazil on February 19, 2018, in Huntington Ingalls’ favor, in an *ad hoc* arbitration (“Arbitration”) pursuant to articles 4 and 5 of the Inter-American Convention on International Commercial Arbitration (the “Panama Convention”) of 1975<sup>1</sup> and the Federal Arbitration Act (“FAA”), 9 U.S.C. §§ 9, 207, 302 and 304. In support of this motion, Huntington Ingalls offers the accompanying memorandum of law in support and the attached declaration of Alexander A. Yanos and the exhibits referred to therein.

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<sup>1</sup> See Inter-American Convention on International Commercial Arbitration [opened for signature Jan. 30, 1975, O.A.S.T.S. No. 42, 1438 U.N.T.S. 245], (reprinted after 9 U.S.C. § 301).

Dated: June 26, 2019

Respectfully submitted,

/s/ Richard P. Salloum

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*(pro hac vice to be applied for)*

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